

The 04-186 proceeding is important because of one clear shortcoming that WISPs have to deal with every single day. WISPs do not have adequate spectrum to operate their networks as effectively as they could with television channel space. The bandspaces that have been set aside for unlicensed use until now have begun a frenzy of activity in telecommunications never before matched. Services, products and technologies have blossomed from the availability of unlicensed spectrum adding billions into the U.S. economy but the bands we have are not enough and the ability to penetrate through foliage or other obstruction at higher frequencies with lower power make these bands hard to operate in as effectively as we could with proper spectrum for broadband deployment. The physics of the frequencies making up the over the air television bands make them ideal for broadband deployment.

Consider, as an example, the role of telecommunications in the relief efforts after hurricane Katrina and Rita. Volunteer WISPs were the first responders to bring services online in many of the affected areas. There was such widespread devastation of critical communications infrastructure that many people did not have a means of communications at all. WISPs and related technology efforts worked feverishly to help bring VOIP telephone service, computers and Internet access to those in shelters and even aid workers and FEMA staff. This critical link to federal online resources, registration to online search databases and phone calls to loved ones, insurance companies, aid agencies and government resources helped thousands of people on the road to putting their lives back together. This work was done largely as volunteer efforts using donated equipment operating in unlicensed frequencies.

The end result of the WISP lack of access to usable bands with better propagation is that many who could have been served in gulf affected areas were not served at all, by anyone. Heavily treed areas or areas simply beyond the radio line of sight of the unlicensed bands we use made access to those who needed help difficult if not impossible in some cases. Sometimes those who were served took longer to get service because of the need to run extra equipment to overcome line of sight issues which led to delays.

The story is simple: if WISPs have access to unused unlicensed television bands the explosion of broadband alternatives will make efforts to bring communications into disaster relief areas a simple matter to address. There are thousands of small WISP operators who strive to be the broadband operator of choice for their small part of the country. These generally middle-class entrepreneur operators thrive in any environment, especially rural areas. WISPs are a good neighbor to have in disaster situations, as well as in rural communities and cities, and they need unused television channel space to help.

The average WISP operator could easily be thought of as an equivalent business to a new millennium family farmer. They just need a little ground (spectrum) to grow on. Selling off agricultural ground in large chunks to a mere handful of highest bidders instead of supporting the thousands of family farmers in the U.S. would be considered a foolish path but that is what is being contemplated with the unused television spectrum.

Middle-class backed operations cannot play in the auction game. We do not need a telecommunications industry made up of spectrum "haves" and "have nots". We need middle class spectrum policy. Making good spectrum available to unlicensed broadband operations is a

good start and I support 04-186 as a step toward a spectrum middle-class that America so disparately needs to thrive and become the number one broadband adopting country in the world.

Another big reason to NOT auction the TV band is innovation. Almost all of the spectrum is already licensed, yet where are the deployments? Where are the customers? Where are the new products and services?

The unlicensed spectrums that WISPs use however, have seen exponential growth since they became available because of the beneficial results for all those involved: hardware developers, small WISP providers, and customers.

Even those with licenses are again talking about going unlicensed. Why? For one reason, it is more economical.

Another problem with auctioning the TV bands is "spectrum camping" mechanisms that seem to have become the norm. Speculators are just sitting on the spectrum they have purchased thinking it an investment. It's a horrible abuse of what's become (right or wrong) a public resource.

As a WISP serving rural and non-rural parts of Northern Dutchess and Ulster Counties, NY, our biggest problem with providing 100% coverage to our potential customers is trees. We are currently turning down about 50% of our requests due to inadequate signal to provide reliable high speed Internet. Since the lower frequencies penetrate foliage better than the higher frequencies, I believe we would be able to reach as many as 90% of those that request service, were we to deploy lower frequency radios.

We also have problems with the current 2.4Ghz band we use being very crowded. The signal to noise ratio gets to the point of making the band unusable in some areas. Having a frequency band allocated just to wireless Internet would alleviate this problems, not just for us, but also for the general consumer who is also trying to use devices in this range. By letting us get out of the range, there would be less congestion for others.

As a "mom & pop" business, we cannot afford to purchase spectrum at auction. What we can do, just as small businesses all around our great country do, is offer services to those areas that no one else services. About 75% of our current customers has access to land line services such as Verizon DSL or Time Warner Cable, and even higher bandwidth fiber solutions. Why do our customers choose to get services from a small, locally grown and operated company? Because we provide local support, better response times, more friendly customer treatment, and most importantly, lower prices. Our focus is on business customers So how can a local WISP offer lower prices fro business oriented broadband service than some of the largest corporations and Telco's in the nation? We use unlicensed wireless spectrum. The gratitude of our customers is part of what makes our business grow. Please provide us (the WISP industry) with some dedicated spectrum that is available based on the services we provide rather than the money we have.